



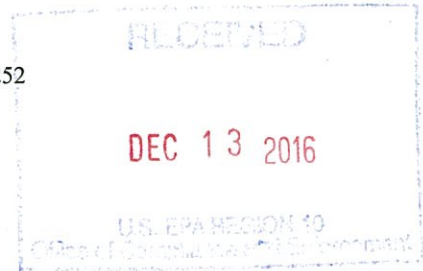
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United States Department of the Interior

FISH AND WILDLIFE SERVICE

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December 8, 2016

To: U.S. EPA Region 10, OCE-133

From: Mark Drobish, Dworshak Fish Hatchery Project Leader

Subject: Non-compliance reporting for the discharge of System III "cleaning" water directly to the North Fork Clearwater River

On December 6-7, 2016 the Dworshak Fish Hatchery (hatchery) crew cleaned the north and south halves of the System III burrows ponds. It was imperative to clean 10 burrows ponds containing spring Chinook salmon and 5 burrows ponds containing coho salmon. Routine cleaning is done to remove solids (i.e. fish feces) to maintain a healthy rearing environment. On both of these days, a portion of the cleaning water was pumped to the bio-filters per our standard operating procedures and a portion was discharged to the North Fork Clearwater River. These operations took place from 9:45 am until 10:45 am on each day respectively. The period of non-compliance was for this week only following a pump failure occurring on December 2, 2016. The failed pump was diagnosed as an electrical issue in the motor. The repair for this motor was expedited and the motor was reinstalled and tested on December 9, 2016. The system is back to full function at this time.

Other factors contributing to the non-compliance discharge:

1. The spring Chinook salmon are typically reared in the raceways; however, the Hatchery experienced a major power outage on November 5, 2016 and operated on partial residential power and two generators until a portable sub-station was installed and full commercial power restored to the hatchery on November 18, 2016. Due to the extended power outage and potential risks to the fish on station, the decision was made to move spring Chinook reared in 20 raceways into 10 burrows ponds in System III for an overall reduction in water use. This decision was made to minimize risk in the event the temporary residential feed failed or our backup generator(s) failed during the extended power outage.
2. As mentioned in the initial description above, on December 1, 2016 one of two lift pumps (pump #2) used for System III cleaning tripped out twice during cleaning operations. These two pumps are essential to transport cleaning water from the System III sump to the bio-filters where solids can settle. After further assessment by our Hatchery Electrician, Jim Oatman, the pump motor needed repair. This pump motor was removed and picked up by Strom Electric, Troy, Idaho on Friday, December 2, 2016. As a result, standard operations were modified on December 6-7, 2016 and cleaning operations were completed utilizing the remaining lift pump (Pump #1). The single pump was not able to keep up with the volume of water generated in the System despite isolating the north and south sides of the System and cleaning on separate days. As the pump fell behind and the channel filled, I made the decision to open an electronic gate (rather than risk damage to the Hatchery's infrastructure) to evacuate water which allows cleaning water to pass through the Hatchery's "Attraction Channel" and discharge into the North Fork

Clearwater River. A key factor was the additional water volume resulting from the 10 burrows ponds containing spring Chinook salmon recently moved from the raceways coupled with a failed pump.

3. Additionally, we have an ongoing electrical repair contract for a faulty conductor which provides power to our Mechanical II Building which in turn provides nursery water for the 128 tanks in the Nursery. This conductor failed early last winter, just prior to the on-set of nursery operations. A temporary alternate line was connected to get us through the nursery rearing season which ran into late September. The Corps of Engineers awarded a contract to remove and replace the failed conductor for fiscal year 2017 with an end date of December 31, 2016. This contracted work has been ongoing but was delayed during our extended power outage in November. The impact of this contract has been repeated temporary outages required for safety for the contractor and staff to complete this work. During these temporary outages, several of our critical pumps and systems are not operable. These systems include electronic gates, lift pumps, sump pumps and pumps that pump off supernatant after solids settling in our bio-filters for cleaning operations; therefore, we have scheduled around the contractors work to complete our base operations for cleaning raceways, System II and System III burrows ponds. We currently require 4 days per week of "normal" operations to complete the essential raceway and burrows pond cleaning.

In a pro-active manner to address our limitations for cleaning in System III, the largest steelhead smolts (i.e. Take 1) were taken off feed during the week of December 5-8, 2016 and these 9 ponds were removed from the cleaning schedule to minimize environmental impacts due to the pump #2 failures and subsequent repair.

If you have any questions regarding this non-compliance discharge, please contact me.

Respectfully,



Mark Drobish
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